

## Chance Weldon

---

**From:** Gomez, Sandy <Sandy.Gomez@huschblackwell.com>  
**Sent:** Tuesday, December 7, 2021 11:51 AM  
**To:** Chance Weldon  
**Cc:** Duggins-Clay, Paige; Christian Townsend  
**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

---

### EXTERNAL

---

Chance,

We will be getting you proposed revisions shortly. Thank you.

Sandy

**Sandy Hellums-Gomez**  
**Partner**  
Direct: 713-525-6222  
[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)

---

**From:** Gomez, Sandy  
**Sent:** Monday, December 6, 2021 8:58 AM  
**To:** Chance Weldon <cweldon@texaspolicy.com>  
**Cc:** Duggins-Clay, Paige <Paige.Duggins-Clay@huschblackwell.com>; Christian Townsend <ctownsend@texaspolicy.com>  
**Subject:** Re: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

Hey Chance. I am still reviewing with my client. I will get back to you by the end of today. Thanks.

Sandy

Sent from my iPhone

On Dec 6, 2021, at 8:56 AM, Chance Weldon <[cweldon@texaspolicy.com](mailto:cweldon@texaspolicy.com)> wrote:

[EXTERNAL EMAIL]

Good morning, y'all. I haven't heard back, so I have to assume you are not agreeing to the protective order. I am now writing to confer under the local rules on a motion for protective order. Please let me know by close of business tomorrow if UNT intends to oppose our motion.

Best,

Chance

---

**From:** Chance Weldon  
**Sent:** Tuesday, November 30, 2021 9:25 AM  
**To:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>  
**Cc:** Duggins-Clay, Paige <[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)>; Christian Townsend

<[ctownsend@texaspolicy.com](mailto:ctownsend@texaspolicy.com)>

**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

Good morning. Hope y'all had a nice Thanksgiving. I'm just following up to see where we stand on this?

---

**From:** Chance Weldon

**Sent:** Monday, November 22, 2021 9:52 AM

**To:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>

**Cc:** Duggins-Clay, Paige <[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)>; Christian Townsend

<[ctownsend@texaspolicy.com](mailto:ctownsend@texaspolicy.com)>

**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

Sorry, I forgot to attach the document. Here you go.

---

**From:** Chance Weldon

**Sent:** Monday, November 22, 2021 9:51 AM

**To:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>

**Cc:** Duggins-Clay, Paige <[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)>; Christian Townsend

<[ctownsend@texaspolicy.com](mailto:ctownsend@texaspolicy.com)>

**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

Sandy,

As we discussed last week, here is a draft proposed protective order. Please let me know if you are agreed.

Thanks,

Chance Weldon

Attorney

Center for the American Future

Texas Public Policy Foundation

P: 512.472.2700

<[image001.png](#)>

*The contents of this email message and any attachments are intended solely for the addressee(s) named in this message. This communication is intended to be and to remain confidential and may be subject to applicable attorney/client and/or work product privileges. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and its attachments. Do not deliver, distribute, or copy this message and/or any attachments and if you are not the intended recipient, do not disclose the contents or take any action in reliance upon the information contained in this communication or any attachments.*

---

**From:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>

**Sent:** Tuesday, November 16, 2021 11:30 AM

**To:** Chance Weldon <[cweldon@texaspolicy.com](mailto:cweldon@texaspolicy.com)>

**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

**EXTERNAL**

Chance,

Are you available to discuss this and our motion scheduling? I am available all afternoon so please let me know if you are available to discuss.

Thanks,  
Sandy

**Sandy Hellums-Gomez**  
**Partner**

Direct: 713-525-6222

[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)

---

**From:** Chance Weldon <[cweldon@texaspolicy.com](mailto:cweldon@texaspolicy.com)>

**Sent:** Monday, November 15, 2021 10:39 AM

**To:** Duggins-Clay, Paige <[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)>; Christian Townsend <[ctownsend@texaspolicy.com](mailto:ctownsend@texaspolicy.com)>

**Cc:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>; Andy Taylor <[ataylor@andytaylorlaw.com](mailto:ataylor@andytaylorlaw.com)>; Schneider, Scott <[Scott.Schneider@huschblackwell.com](mailto:Scott.Schneider@huschblackwell.com)>; Nobles, Jeff <[Jeff.Nobles@huschblackwell.com](mailto:Jeff.Nobles@huschblackwell.com)>

**Subject:** RE: YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

[EXTERNAL EMAIL]

Counsel,

I looked at the discovery requests you sent over. The majority of these requests are overbroad, harassing, and outside the scope of what is necessary for this case. For example, you request the names and contact information of all YCT members, as well as years worth of YCT's financial records. The Fifth Circuit has made clear that such requests violate the First Amendment. *Hastings v. N. E. Indep. Sch. Dist.*, 615 F.2d 628 (5th Cir. 1980); *Sierra Club v. Energy Future Holdings Corp.*, No. 5:10CV156, 2013 U.S. Dist. LEXIS 205931, at \*10-11 (E.D. Tex. Dec. 30, 2013).

I understand that UNT has some interest in determining whether YCT has membership sufficient to establish standing. We are willing to discuss terms of a protective order to allow discovery on that issue to take place while protecting the fundamental rights of our clients. However, your current requests are not sufficiently tailored to satisfy First Amendment scrutiny.

Given that we are on a short discovery schedule, I wanted to flag these issues for you early so that we can work things out, rather than simply waiting thirty days to serve you with objections to your requests.

Please let me know if you are available this week to discuss a possible protective order. I believe the Eastern District has a standard protective order that we can start with as a model.

Thanks,

Chance Weldon  
Attorney  
Center for the American Future  
Texas Public Policy Foundation

P: 512.472.2700

<image001.png>

*The contents of this email message and any attachments are intended solely for the addressee(s) named in this message. This communication is intended to be and to remain confidential and may be subject to applicable attorney/client and/or work product privileges. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and its attachments. Do not deliver, distribute, or copy this message and/or any attachments and if you are not the intended recipient, do not disclose the contents or take any action in reliance upon the information contained in this communication or any attachments.*

---

**From:** Duggins-Clay, Paige <[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)>

**Sent:** Friday, November 12, 2021 3:13 PM

**To:** Chance Weldon <[cweldon@texaspolicy.com](mailto:cweldon@texaspolicy.com)>; Christian Townsend <[ctownsend@texaspolicy.com](mailto:ctownsend@texaspolicy.com)>; Rob Henneke <[rhenneke@texaspolicy.com](mailto:rhenneke@texaspolicy.com)>; Aaron Barnes <[abarnes@texaspolicy.com](mailto:abarnes@texaspolicy.com)>

**Cc:** Gomez, Sandy <[Sandy.Gomez@huschblackwell.com](mailto:Sandy.Gomez@huschblackwell.com)>; Andy Taylor <[ataylor@andytaylorlaw.com](mailto:ataylor@andytaylorlaw.com)>; Schneider, Scott <[Scott.Schneider@huschblackwell.com](mailto:Scott.Schneider@huschblackwell.com)>; Nobles, Jeff

<[Jeff.Nobles@huschblackwell.com](mailto:Jeff.Nobles@huschblackwell.com)>

**Subject:** YCT v. UNT - Defendants' First Interrogatories and RFPs to Plaintiff

**EXTERNAL**

Good afternoon,

Attached please find Defendants' first interrogatories and requests for production to Plaintiff. I am also attaching a word document as a courtesy for the response. We are also sending a paper copy of these requests via mail. Please advise whether you will consent to electronic service going forward.

Thank you,

**Paige Duggins-Clay**  
**Attorney**

**HUSCH BLACKWELL LLP**

111 Congress Avenue,  
Suite 1400  
Austin, TX 78701-4093  
Direct: 512-479-1156  
Fax: 512-479-1101

[Paige.Duggins-Clay@huschblackwell.com](mailto:Paige.Duggins-Clay@huschblackwell.com)  
[huschblackwell.com](http://huschblackwell.com)  
[View Bio](#) | [View VCard](#)

Husch Blackwell is redefining partnership and client service. With 800+ lawyers in 25 offices across the United States, including [The Link](#) virtual office, we are a national law firm with a coast-to-coast footprint focused on tackling the most complex business challenges.